

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail  
Service Standards

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Docket No. C2001-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-1-15)  
September 17, 2001

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-

1). Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,

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OCA/USPS-1. Docket No. N89-1, USPS-T-2, Appendix A at 19, indicated that there was a semi-annual delivery standard review process. Are service delivery standards currently reviewed on a semi-annual basis? If so, what specific classes and types of mail are reviewed and what does the delivery standard review process encompass? If not, please explain what delivery standards are reviewed and when.

OCA/USPS-2. Currently, is the Divisional General Manager responsible for finalizing the First-Class delivery standards? If not, please explain who is responsible for finalizing First-Class delivery standards?

OCA/USPS-3. What office or personnel position is responsible for providing the final approval for the various regional delivery standards?

OCA/USPS-4. Docket No. N89-1, USPS-T-2, Appendix A at 20, indicated that prior to implementation of the approved delivery standards, each "Field Division Director of Marketing and Communications will execute a plan to notify business and residential customers of the resulting delivery changes." Please describe the methods used and provide copies of all documentation used to inform business and residential customers of the changes that were made in the Phase 2 delivery standards.

OCA/USPS-5. Does the Postal Service believe that the term "one-day standard" is equivalent to the term "one-day delivery"? If not, please explain.

OCA/USPS-6. Does the Postal Service believe that the term "two-day standard" is equivalent to the term "two-day delivery"? If not, please explain.

OCA/USPS-7. Does the Postal Service believe that the term "three-day standard" is equivalent to the term "three-day delivery"? If not, please explain.

OCA/USPS-8. An article, "USPS allows comment on service changes," January 1990, Bank Operations Bulletin, indicates that the ABA, other mailers and bankers would be allowed to review service changes well before they were put into effect. (Docket No. N89-1, Transcript of Proceedings, Volume 5 at 1065.) The following interrogatories refer to information provided in that article.

- a. Were the ABA, residential customers and other businesses' concerns factored into the adopted Phase 2 service changes? If so, please explain (1) what concerns were addressed and (2) how those concerns were factored in. If customer's concerns were not factored in, please explain why not.
- b. Prior to the "Phase 2" service changes, were the ABA, residential customers and other businesses given the opportunity to review and comment on the service changes in advance of their implementation?
- c. If your response to part "b" of this interrogatory is affirmative, please provide copies of the comments provided to the Postal Service by the various mailers. If no comments can be provided, please explain why none are available.
- d. If no opportunities to review the service changes were provided to the ABA, residential customers or businesses, please explain why none were provided.
- e. Please provide copies of all documents provided to the ABA, residential customers and other businesses informing them of the USPS service changes.
- f. Please provide copies of information or data analysis performed by or for the Postal Service regarding the ABA, residential customers and businesses

mailing volumes and patterns that were used in developing the Phase 2 service standards.

OCA/USPS-9. For the period two years prior to, and all periods subsequent to, the implementation of the Phase 2 service standards, please provide copies of any reports and other data analysis performed indicating the actual service standards achieved. If no analysis was performed, please explain why.

OCA/USPS-10. What is the on-time delivery record for the 3-digit Zip-Code pairs that were changed during 2000 and 2001 from three days to two days? What was the on-time delivery record for the same Zip-Code pairs for the two years immediately prior the implementation of the Phase 2 service standards?

OCA/USPS-11. Has the Postal Service performed any costing analysis to measure the actual or projected cost savings derived from implementing the Phase 2 service standards? If so, please provide copies of all such analysis. If not, please explain why none has been performed.

OCA/USPS-12. Mr. Gannon's Declaration at page 8 indicates that the Postal Service built a computer model using a customized transportation software package to determine which ZIP Code pairs qualified for 2-Day service by using a formula which could be applied nationwide.

- a. Please describe the formula in both mathematical and layman's terms.
- b. Please provide a copy of the computer model and a copy of the customized transportation software package.

OCA/USPS-13. Mr. Gannon's Declaration states at page 8 that, "we decided upon a maximum 12-hour highway drive-time range by which to determine those destinations

that would become part of the 2-Day service area for any Processing Plant of origin. The remaining 3-digit ZIP-Code areas beyond 12 hours became part of the 3-Day service standard network.”

- a. Does this mean that the 12-hour drive time standard applies only to First-Class mail originating at a processing plant. If so, then for any given processing plant, could the service standard be different for mail entered into the mailstream at a mailbox within the processing plant’s processing area? If not, please explain.
- b. Did any 3-digit Zip Code pairs that were changed from a 2-Day to a 3-Day service standard involve less than a 12-hour highway drive time? If so, please identify them by ZIP-Code and location and indicate whether they were concentrated in a particular geographic area of the nation.

OCA/USPS-14. In developing a nationwide standard for the delivery times and the computer formula for drive times, did the Postal Service consider and reject other parameters such as a combination of mileage and drive-time, or varying the standard for different geographic regions to recognize the larger distances within western states, or the proximity of a state capitol or major metropolitan area?

OCA/USPS-15. Mr. Gannon’s Declaration states on page 7 that the National mandates for NLT [“No Later Than”] CTs [“Clearance Times”] and NET CETs [“No Earlier Than”] [“Critical Entry Times”] became effective on May 22, 1999. He indicates these times were used to establish windows for transportation between originating and destinating facilities.

- a. Please describe these National mandates in more detail and provide the documentation that establishes the National mandates.
- b. Did the various “clearance times” and “critical times” tend to be later in the western states such that the length of the service standard was affected adversely in those areas?



## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

\_\_\_\_\_/s/ h'Enri Whitseyjohnson  
h'Enri Whitseyjohnson

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